

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

HAROLD KELLY MURPHY,

Plaintiff,

v.

SOUTHERN ENERGY HOMES, INC.,

Defendants.

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Case No.: 3:06-cv-618-MEF

MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Defendant, Southern Energy Homes, Inc. (“Southern Energy”), moves this Court for entry of the attached Stipulated Protective Order and, as grounds, therefor, states as follows:

1. On or about June 14, 2006, Harold Kelly Murphy (hereinafter referred to as “Plaintiff”) commenced the above-styled action against Southern Energy.

2. Pursuant to Fed.R.Civ.P. 26(f), the parties prepared and filed their Report of Parties’ Planning Meeting form.

3. In accordance with the Planning Meeting form, the parties exchanged their respective Rule 26(a) Initial Disclosures. As noted on Southern Energy’s Initial Disclosures, some of the information it desires to produce is proprietary and should be kept confidential.

4. The Parties have mutually agreed upon a protective order which addresses the concerns of Southern Energy. The mutually agreed upon protective order is attached hereto as Exhibit A.

5. The parties are in the discovery phase of this litigation and, therefore, request that this Court entered the agreed upon protective order.

WHEREFORE, Southern Energy Homes, Inc. respectfully request that this Court enter the attached Stipulated Protective Order and for such other relief as this Court deems appropriate.

Respectfully submitted,

/s Mitchel H. Boles

Robert D. Segall (ASB-7354-E68R)
Lee H. Copeland (ASB-3461-O72L)
Mitchel H. Boles (ASB-0813-S69M)

Copeland, Franco, Screws & Gill, P.A.
444 South Perry Street
P. O. Box 347
Montgomery, AL 36101-0347
Phone: 334/834-1180
Facsimile: 334/834-3172
Email: segall@copelandfranco.com
Email: copeland@copelandfranco.com
Email: boles@copelandfranco.com

Attorney for Southern Energy Homes, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of October, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

- **Charles Lance Gould**
lance.gould@beasleyallen.com holly.stroh@beasleyallen.com
- **Carter Gibson Vance**
gibson.vance@beasleyallen.com heidi.bowers@beasleyallen.com

/s Mitchel H. Boles
Of Counsel